



ROSSE LITHOGRAPHING CO.

PRECISION LITHOGRAPHY

Division of GLOE GRAPHICS, INC.

2100 Wyandotte
Kansas City, Missouri 64108
(816) 842-4669

Alma Moreno Lahm
Environmental Protection Agency Region VII
910 North 5th St.
Kansas City, KS 66101-2907

REC'D

FEB 21 2001

RESP

Alma,

This letter is in response to the citations issued to us on 7/6/00. If there are any questions please feel free to call and we will help in any way we can.

Item #1- We have determined our fluorescent lamps to be non-hazardous. Please see the attached MSDS sheets for details.

Item # 2- We have determined the etching solution and dampening solution to be a non-hazardous waste. The people at Millennium waste disposal have furnished us adequate information to make this determination. These are attached.

Item # 3- We had blanket wash stored approximately 30 days in excess of the 270 days required. This happened because our waste hauler went out of business. We are an ISO 9002 certified printing company and as such, we are required to certify our vendors for use. This process took a little longer than we had anticipated. At the time of the audit all over due product had been removed properly and we were back on our normal schedule.

Items # 4-Item # 6- These items are all labeling issues that we have handled internally. As of the date of this letter we have retrained our internal materials manager in the proper labeling of hazardous material in different stages of collection and storage and have corrected the labeling problems noted in your comments.

Item # 7- The satellite drum where the blanket wash is collected is pumped into under pressure. When the drum is sealed, the contents back up and shut down operation of the machine. We have modified a bung to accommodate the drain hose and added a pressure relief valve. This minimized the open area and allows operation of the machine.

Item # 8 - Item # 13 - These items are manifest errors. We were wrong to trust the professionalism of our vendor. We met 7/12/00 at 9:30 am to correct the identified errors and to set up procedures to keep future errors from occurring including our review of their documentation for accuracy.

Item # 14 - As of 7/12/00, we have cleaned up all oil under the machinery. We have modified our schedule to daily inspections and weekly floor maintenance on the second floor. The garage area under the machines is under the landlord's control and he has continually blocked our attempts to clean up and contain any messes in that area. We will make every effort to obtain permission to clean up the area in question. We had a device in place to collect the oil that would drip below the floor but he made us remove it.

Item # 15- The spill control kits have been obtained for both the second and fifth floors. They are marked on the attached facility map with the fire extinguishers.

Item # 16 - The same facility maps that show the fire extinguisher and spill cleanup locations are posted next to the phones. We were in the process of updating these during the inspection. They are presently in place as of the date of this letter.

Item # 17 - We are handling this labeling issue internally. We have relabeled the container.

As Of July 12, 2000, all of the items cited by you have been corrected and we would encourage a follow up visit to confirm such.

Hank Rosebrough

Hank Rosebrough
Plant Manager



R00401638

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PHILIPS

Philips Lighting Company

MSDS -- T-12/RS/CW/EWII/ALTO

Page 3 of 3

SECTION 8: CONTROL MEASURES

Respiratory Protection: Appropriate dust mask should be used if large quantities of lamps are being broken for disposal.

Ventilation: Avoid inhalation of any airborne dust. Provide local exhaust when disposing of large quantities of lamps.

Hand and Eye Protection: Appropriate hand and eye protection should be worn when disposing of large quantities of lamps or handling broken lamps.

SECTION 9: REGULATORY INFORMATION

Under current federal regulations, the ALTO™ lamp will qualify as a Subtitle "D" waste.

September 1996

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PHILIPS

Philips Lighting Company

MSDS - T-12/RS/CW/EWIL/ALTO

Page 2 of 3

SECTION 4: FIRE AND EXPLOSION DATA

FIRE AND EXPLOSION DATA NOT APPLICABLE - under extreme heat, glass envelope might melt or crack.

SECTION 5: REACTIVITY DATA

Stability: Lamp is stable.
Polymerization: Not applicable.
Incompatability: Glass will react with Hydrofluoric Acid.

SECTION 6: HEALTH HAZARD DATA

Not applicable to the intact lamp. Breakage of the lamp may result in some exposure to the phosphor powder dust and to a very little amount of elemental mercury vapor. No adverse affects are expected from occasional exposure to broken lamps, but as a matter of good practice, prolonged or frequent exposure should be avoided through the use of adequate ventilation during disposal of large quantities of lamps.

EMERGENCY FIRST AID: NORMAL FIRST AID PROCEDURE FOR GLASS CUTS IF SUCH OCCUR THROUGH LAMP BREAKAGE.

SECTION 7: PRECAUTIONS FOR SAFE HANDLING AND USE

Normal precautions should be taken for the collection of broken glass.

Waste Disposal Method: At the end of rated life, when this lamp is removed from service, it will, when subjected to the current Toxic Characteristic Leaching Procedure (TCLP) prescribed by the Environmental Protection Agency for determining whether an item is a hazardous waste, be listed as a non-hazardous waste under current E. P. A. definition. Philips Lighting will provide the test protocol on request. This result will allow the end user to evaluate all of the disposal options which may be available in the particular state in which the generator facility is located. The generator should check with local and state officials for their guidance. Philips encourages recycling of its products by qualified recyclers.

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PHILIPS

Philips Lighting Company

MATERIAL SAFETY DATA SHEET

PRODUCT: ALTO™ Fluorescent Lamp
F-96/T-12/RS/CW/EWII/ALTO

Revised 10/16/96

SECTION 1: MANUFACTURER

Manufacturer's Name and Address: Philips Lighting Company
A division of Philips Electronics
North America Corporation
200 Franklin Square Drive
Somerset, New Jersey 08875

Emergency Telephone No.: (908)563-3197
Other Information Calls: (908)563-3488

SECTION 2: HAZARDOUS INGREDIENTS

	OSHA (PEL) mg/m ³	ACGIH (TLV) mg/m ³ TWA	% by Wt.
<u>Inert Ingredients (Glass, Aluminum, etc.)</u>			Approx 97%
Phosphor Powder			Approx 3%
Nuisance Dust	15	10	
Fluorides* (as F)		2.5	Approx .01%
Antimony*(7440-36-0)	.5	.5	Approx .01%
Manganese*(7439-96-5)	.2	.2	Approx .02%
Mercury (7439-97-6)	.1	.025	< than 20 ppm

*These materials are tightly bound within the crystal matrix of the phosphor (Calcium Phosphate).

SECTION 3: CHEMICAL/PHYSICAL DATA

Not applicable. This item is a light bulb. The bulb is glass, the base is a coated aluminum. The coating is inert.

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**PHILIPS****Philips Lighting Company****MSDS — ALTO™ Fluorescent Lamps**
Page 3 of 3**SECTION 7: PRECAUTIONS FOR SAFE HANDLING AND USE**

Normal precautions should be taken for the collection of broken glass.

Waste Disposal Method: At the end of rated life, when this lamp is removed from service, it will, when subjected to the current Toxic Characteristic Leaching Procedure (TCLP) prescribed by the Environmental Protection Agency for determining whether an item is a hazardous waste, be listed as a non-hazardous waste under current E. P. A. definition. Philips Lighting will provide the test protocol on request. This result will allow the end user to evaluate all of the disposal options which may be available in the particular state in which the generator facility is located. This lamp passes all of the tests required by California to qualify as a non-hazardous waste in that state. The generator should check with local and state officials for their guidance. Philips encourages recycling of its products by qualified recyclers.

SECTION 8: CONTROL MEASURES

Respiratory Protection: Appropriate dust mask should be used if large quantities of lamps are being broken for disposal.

Ventilation: Avoid inhalation of any airborne dust. Provide local exhaust when disposing of large quantities of lamps.

Hand and Eye Protection: Appropriate hand and eye protection should be worn when disposing of large quantities of lamps or handling broken lamps.

SECTION 9: REGULATORY INFORMATION

Under current federal regulations, the ALTO™ lamp will qualify as a Subtitle "D" waste.

January 1996

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**PHILIPS****Philips Lighting Company****MSDS -- ALTO™ Fluorescent Lamps****Page 2 of 3****SECTION 2: HAZARDOUS INGREDIENTS (Cont'd)**

Mercury (7439-97-6) 1 .025 < than 20 ppm

† PEL & TLV are given for magnesium, aluminum oxide, and yttrium. Barium aluminate is not a soluble compound.

SECTION 3: CHEMICAL/PHYSICAL DATA

Not applicable. This item is a light bulb 4 ft. long, 1.5 inches in diameter. The bulb is glass, the base is a coated aluminum. The coating is inert.

SECTION 4: FIRE AND EXPLOSION DATA

FIRE AND EXPLOSION DATA NOT APPLICABLE -- under extreme heat, glass envelope might melt or crack.

SECTION 5: REACTIVITY DATA

Stability: Lamp is stable.
Polymerization: Not applicable.
Incompatibility: Glass will react with Hydrofluoric Acid.

SECTION 6: HEALTH HAZARD DATA

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EMERGENCY FIRST AID: NORMAL FIRST AID PROCEDURE FOR GLASS CUTS IF SUCH OCCUR THROUGH LAMP BREAKAGE.

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A division of
Philips Electronics North America Corporation

200 Franklin Square Drive
P.O. Box 6800
Somerset, NJ 08875-6800
Tel: 908 563-3000

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PHILIPS

Philips Lighting Company

MATERIAL SAFETY DATA SHEET

Revision: 7/15/96

PRODUCT: ALTO™ Fluorescent Lamp (34W Econ-O-Watt™ Cool White)
 34 W Econo-Watt™ (Cool White & Warm White)
 Spec Econo-Watt™ Series
 Ultralume™ Series

SECTION 1: MANUFACTURER

Manufacturer's Name and Address: Philips Lighting Company
 A division of Philips Electronics
 North America Corporation
 200 Franklin Square Drive
 Somerset, New Jersey 08875

Emergency Telephone No.: (908)563-3197
Other Information Calls: (908)563-3488

SECTION 2: HAZARDOUS INGREDIENTS

	OSHA (PEL) mg/m ³	ACGIH (TLV) mg/m ³ TWA	% by Wt.
<u>Inert Ingredients (Glass, Aluminum, etc.)</u>			Approx 97%
<u>If Cool White or Warm White:</u>			
Phosphor Powder			Approx 3%
Nuisance Dust	15	10	
Fluorides* (as F)		2.5	Approx .01%
Antimony*(7440-36-0)	.5	.5	Approx .01%
Manganese*(7439-96-5)	.2	.2	Approx .02%

*These materials are tightly bound within the crystal matrix.

If Spec or Ultralume, may have some of the above, but main phosphor components are listed below:

Cerium Magnesium Terbium Aluminate†	N/A	10	Approx .25%
Barium Magnesium aluminate†	N/A	10	Approx .5%
Yttrium Oxide (1314-36-9)†	1.0	1.0	Approx .5%

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FROM :

MAY-05 00 09:05 FROM:ENSA/IND

FAX NO. :

219-234-0336

Jul. 12 2000 02:34PM P2

TO:18 8734199

PAGE:01

LABORATORY REPORT

ANALYSIS PERFORMED BY:

MEI-IN

604 S. SCOTT St.

SOUTH BEND, IN 46601

Phone (219) 234-0441

Fax (219) 234-0336

GENERATOR NAME: ROSSE LITHOGRAPHING CO.

STREAM#: NA

LAB ID: 200005017

REPORT DATE: 4/03/00

SAMPLE DESCRIPTION: LOW VISC. GRAY LIQUID (RUNNIE WILLIAMS)

PARAMETERS

BTU/lb	14200
WATER (%)	8
CHLORINE (%)	60.30
FLUORINE (%)	60.010
TOTAL HALOGENS (%)	60.30
SULFUR (%)	NTF
PCB (ppm)	5.0
BENZENE (ppm)	110
SOLIDS (%)	1.0
ASH (%)	1.0
DENSITY (LB/GAL)	7.04
pH	9.8
FLASH (°F)	100
VISCOSITY (cps)	1.0

ANTIMONY	2.8
ARSENIC	1.3
BARIUM	5.0
BERYLLIUM	60.50
CADMIUM	1.0
CHROMIUM	1.5
LEAD	3.7
MERCURY	1.0
NICKEL	1.3
SELENIUM	3.3
SILVER	1.0
THALLIUM	1.0
ZINC	2.5

NOTE: All metals reported as mg/l/g
NTF=Not Tested For

Elizabeth Chamberlain
(signed for the laboratory)

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LABORATORY REPORT

ANALYSIS PERFORMED BY:

MEI-IN

604 S. SCOTT St.

SOUTH BEND, IN 46601

Phone (219) 234-0441

Fax (219) 234-0336

GENERATOR NAME: RON LITHO

STREAM#:

LAB ID: 9910135

REPORT DATE: 10/14/99

SAMPLE DESCRIPTION: POLLY ~~ETCHING~~ -- LIQUID, LOW, GREEN

Profile # 04

PARAMETERS

BTU/lb	2140
WATER (%)	79
CHLORINE (%)	<0.30
FLUORINE (%)	NIF
TOTAL HALOGENS (%)	NIF
SULFUR (%)	NIF
PCB (ppm)	<5.0
BENZENE (ppm)	<10.
SOLIDS (%)	<1.0
ASH (%)	<1.0
DENSITY (LB/GAL)	8.72
pH	4.8
FLASH (°F)	>200
VISCOSITY (cps)	10

ANTIMONY	5.8
ARSENIC	<1.0
BARIUM	1.2
BERYLLIUM	<0.50
CADMIUM	<1.0
CHROMIUM	<1.0
LEAD	<1.0
MERCURY	<1.0
NICKEL	1.2
SELENIUM	1.7
SILVER	8.7
THALLIUM	1.4
ZINC	2.0

NOTE: All metals reported as mg/Kg
NIF=Not Tested For

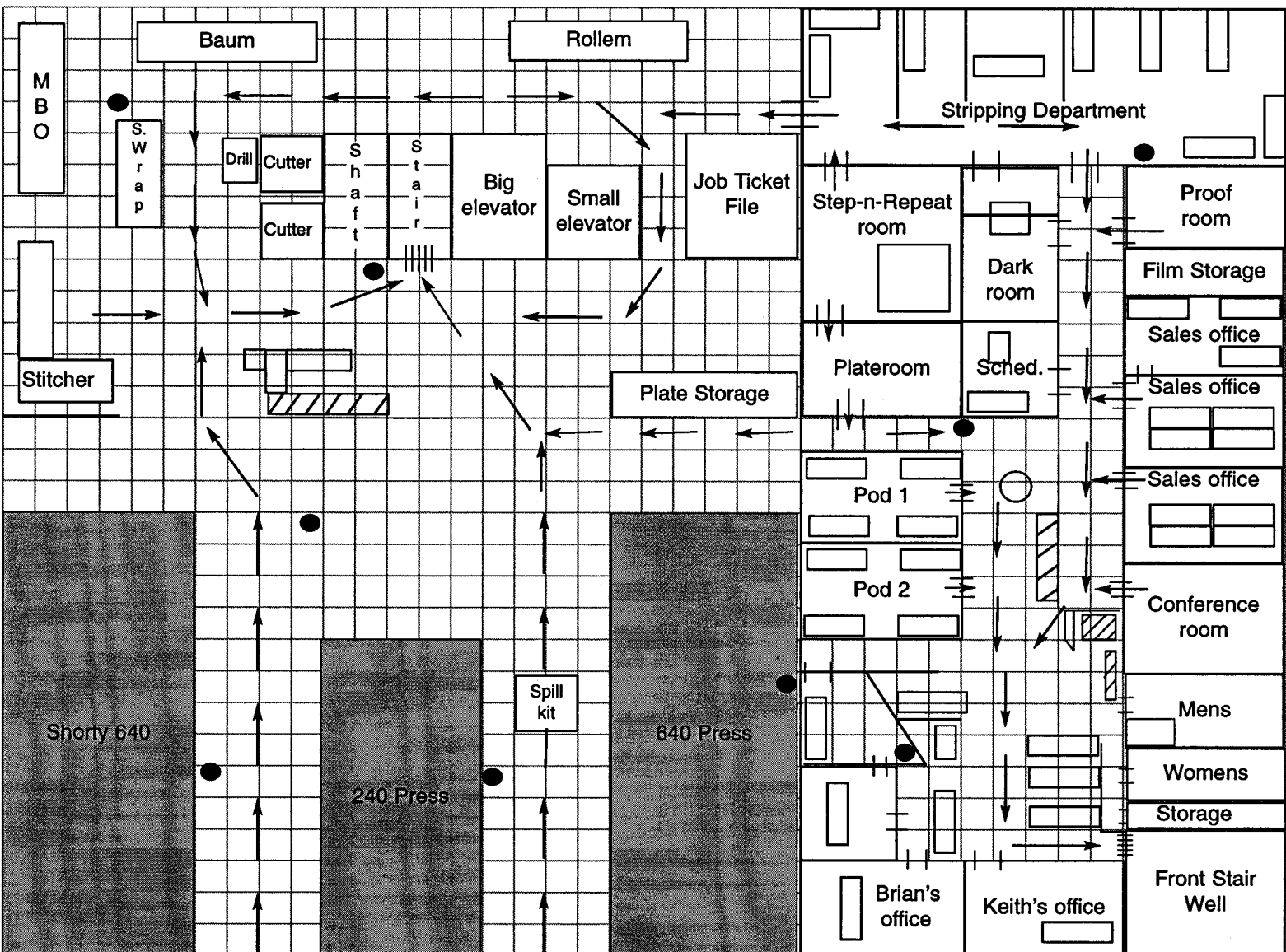
Chun Chang
(signed for the laboratory)

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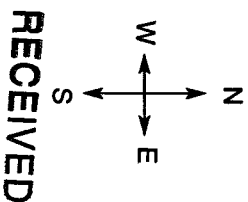
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In case of emergency contact, Plant Manager



Fire escape route for all departments.

Please follow the arrows when walking calmly towards the exit.

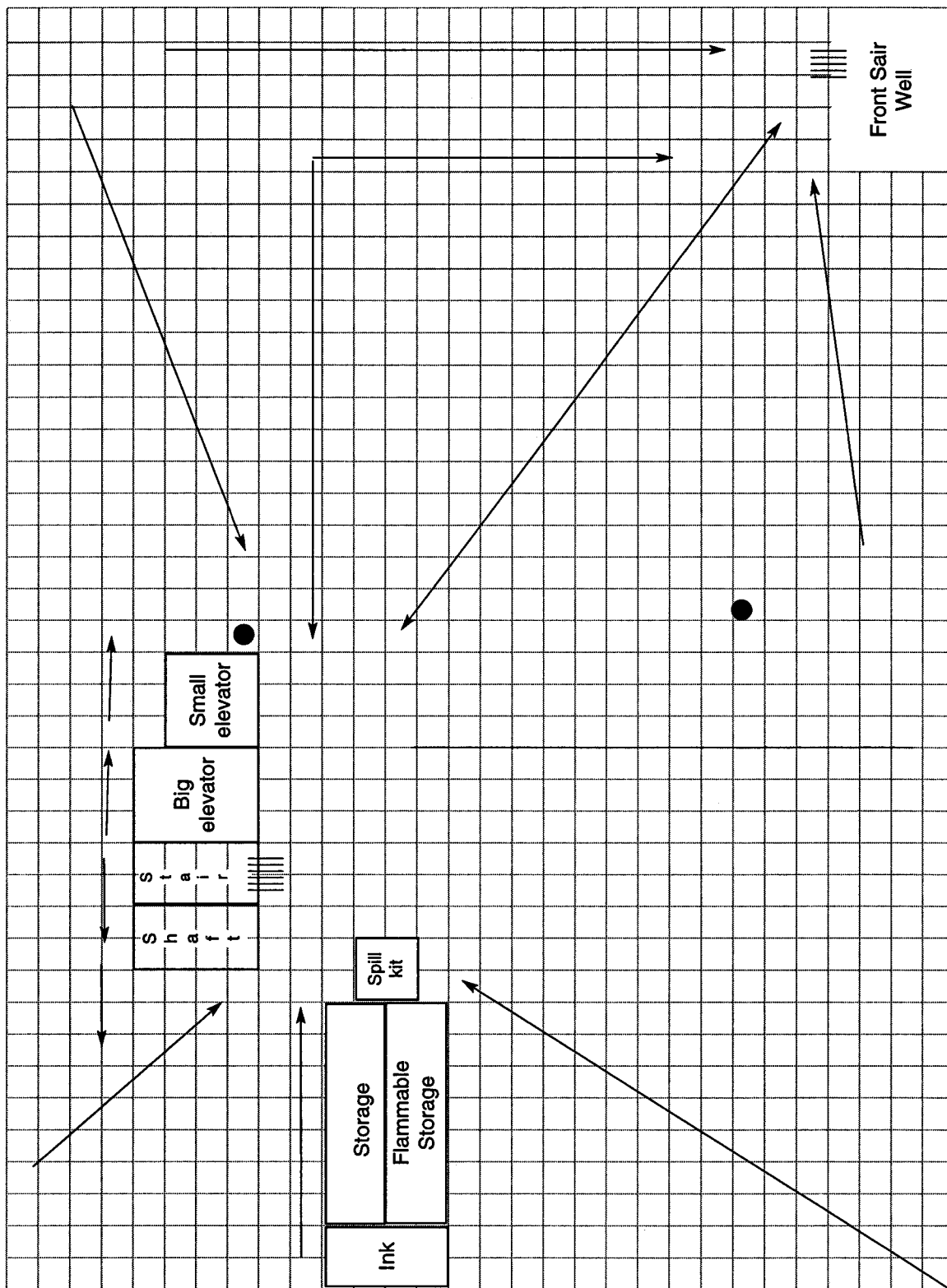


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rv. 7-24-98

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In case of emergency contact, Plant Manager

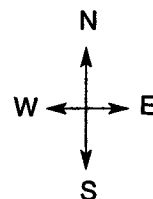


● - Fire extinguish-

|||| - Exit

Fire escape route for all.

Please follow the arrows when walking calmly towards the exit.



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